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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JUAN VALENTIN MANRIQUEZ, and  
ANDREW LARRABURE-TUMA,  
  
Defendants.

CASE NO. 2:21-CR-0213-KJM

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL  
ACT; ORDER

DATE: January 10, 2022  
TIME: 9:00 a.m.  
COURT: Hon. Kimberly J. Mueller

**STIPULATION**

1. By previous order, this matter was set for status on January 10, 2022.
2. By this stipulation, defendants now move to continue the status conference until February 14, 2022, and to exclude time between January 10, 2022, and February 14, 2022, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes law enforcement reports, audio recordings, and video recordings. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
  - b) Counsel for defendants desire additional time review the discovery,

1 consult with their clients, conduct defense investigation, discuss potential resolution  
2 options, and otherwise prepare for trial.

3 c) Counsel for defendants believe that failure to grant the above-  
4 requested continuance would deny them the reasonable time necessary for effective  
5 preparation, taking into account the exercise of due diligence.

6 d) The government does not object to the continuance.

7 e) Based on the above-stated findings, the ends of justice served by  
8 continuing the case as requested outweigh the interest of the public and the  
9 defendant in a trial within the original date prescribed by the Speedy Trial Act.

10 f) For the purpose of computing time under the Speedy Trial Act, 18  
11 U.S.C. § 3161, et seq., within which trial must commence, the time period of  
12 January 10, 2022, to February 14, 2022, inclusive, is deemed excludable pursuant to  
13 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a  
14 continuance granted by the Court at defendant's request on the basis of the Court's  
15 finding that the ends of justice served by taking such action outweigh the best  
16 interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: January 3, 2022

PHILLIP A. TALBERT  
United States Attorney

/s/ JUSTIN L. LEE  
JUSTIN L. LEE  
Assistant United States Attorney

Dated: January 3, 2022

/s/ MEGHAN McLOUGHLIN  
MEGHAN McLOUGHLIN  
Counsel for Defendant  
Andrew Larrabure-Tuma

Dated: January 3, 2022

/s/ JENNIFER MOUZIS  
JENNIFER MOUZIS  
Counsel for Defendant  
Juan Manriquez

**ORDER**

IT IS SO ORDERED. The status conference set for January 10, 2022 is vacated and reset for February 14, 2022 at 9:00 a.m., and time is excluded between January 10, 2022, and February 14, 2022, under Local Code T4.

DATED: January 4, 2022

  
CHIEF UNITED STATES DISTRICT JUDGE